

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	CHAPTER 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	CASE No. 20-50805

---

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc.; and Longbranch	§	
Energy, LP, et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

---

DMA Properties, Inc. and Longbranch	§	
Energy, LP, et al.	§	
	§	
<i>Counterplaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
KrisJenn Ranch, LLC; Larry Wright, et	§	
al.,	§	
	§	
<i>Counterdefendants.</i>	§	

**DMA AND LONGBRANCH’S REPLY IN SUPPORT  
OF BRIEFING ON REMEDIES**

On November 8, DMA Properties and Daniel Moore (collectively, “DMA”) and Longbranch Energy (“Longbranch”) filed twenty-six pages of briefing detailing the additional remedies that they are entitled to in the wake of the district court’s ruling as well as the bases for seeking such relief. In response, Wright and his entities have filed a four-page response brief which does not acknowledge or even attempt to rebut most of the points raised by DMA and Longbranch.

Notwithstanding the brevity of his response, Wright is apparently not done litigating the matters raised by this lawsuit. On January 4, 2024, DMA and Longbranch received demand letters from Rafe Schaefer—an attorney at Norton Rose Fulbright—on behalf of Wright and his *new* entity, Express H2O Pipeline & ROW, to which Wright has transferred the right-of-way at issue in this case in violation of this Court’s prior orders. *See* Ex. 1 (Demand Letter). The demand letter threatens to bring claims for breach of fiduciary duty and fraud against DMA and Longbranch—arising from the same facts at issue in this lawsuit—unless DMA and Longbranch relinquish their judicially-upheld net-profits interests in the right-of-way *and* pay Wright \$5 million.

The problem with Wright’s demand letter is that it is threatening to assert claims that (a) have already been decided in this litigation; (b) would have been compulsory counterclaims in this litigation even if not brought; and (c) would be barred by the statute of limitations in any event. And the fact that Wright is now seeking to circumvent this Court by relitigating stale matters is yet further evidence that Wright is continuing to act in bad faith and that Wright has no intention of respecting this Court’s rulings or, apparently, even its jurisdiction.

For the reasons stated in their existing briefing, DMA and Longbranch respectfully request the Court provide the relief and remedies sought therein. DMA and Longbranch also respectfully request any other relief to which they may be justly entitled at law or in equity.

Respectfully submitted,

/s/ Christopher S. Johns

Christopher S. Johns  
State Bar No. 24044849  
COBB & JOHNS PLLC  
2028 East Ben White Boulevard  
Suite 240-1000  
Austin, TX 78741  
512-399-3150  
cjohns@cobbjohns.com

/s/ Timothy Cleveland

Timothy Cleveland  
State Bar No. 24055318  
Austin H. Krist  
State Bar No. 24106170  
CLEVELAND KRIST PLLC  
303 Camp Craft Road, Suite 325  
Austin, Texas 78746  
(512) 689-8698  
tcleveland@clevelandkrist.com  
akrist@clevelandkrist.com

*Attorneys for Longbranch Energy, DMA  
Properties, and Frank Daniel Moore*

Natalie F. Wilson  
State Bar No. 24076779  
LANGLEY & BANACK  
745 East Mulberry Avenue, Suite 700  
San Antonio, Texas 78212  
210-736-6600  
210-735-6889 fax  
nwilson@langleybanack.com

*Attorneys for DMA Properties and Frank  
Daniel Moore*

Michael Black  
BURNS & BLACK PLLC  
750 Rittiman Road  
San Antonio, TX 78209  
mblack@burnsandblack.com

Jeffery Duke  
JF DUKE AND ASSOCIATES  
11819 Great Oaks Drive  
College Station, TX 77494  
jeff@jfduke.com

*Attorneys for Longbranch Energy*

### CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2024, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

<p>Charles John Muller, IV CJ MULLER &amp; ASSOCIATES, PLLC 111 W. Sunset San Antonio, TX 78209 ron@smeberg.com john.muller@cjma.law</p> <p><i>Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row</i></p>	<p>Michael Black BURNS &amp; BLACK PLLC 750 Rittiman Road San Antonio, TX 78209 mblack@burnsandblack.com</p> <p>Jeffery Duke JF DUKE AND ASSOCIATES 11819 Great Oaks Drive College Station, TX 77494 jeff@jfduke.com</p> <p><i>Counsel for Longbranch Energy, LP</i></p>
<p>Ronald J. Smeberg THE SMEBERG LAW FIRM, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926 ron@smeberg.com</p> <p><i>Counsel for Black Duck Properties, LLC</i></p>	<p>James Rose OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, TX 78701 james.rose@usdoj.gov</p> <p><i>United States Trustee</i></p>
<p>William P Germany BAYNE, SNELL &amp; KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, TX 78209 wgermany@bsklaw.com</p> <p><i>Counsel for Larry Wright</i></p>	<p>Laura L. Worsham JONES, ALLEN &amp; FUQUAY, L.L.P. 8828 Greenville Avenue Dallas, TX 75243 lworsham@jonesallen.com</p> <p><i>Counsel for McLeod Oil, LLC</i></p>

/s/ Christopher S. Johns  
Christopher S. Johns